



THE PREMIER PROVIDER OF ENVIRONMENTAL SOLUTIONS



*Enhancing Public Health and Safety
Through Quality Testing and Engineering*

ELAP Comment for CA Waterboard Dr. C. Bruce Godfrey

May 3, 2017

ELAP is Implementing Best Practices

ACIL, is the national trade association for independent scientific, testing, and engineering firms, representing 150 laboratories with over 1,500 laboratory locations performing >60% of all laboratory tests supporting drinking water and environmental regulatory compliance in California.

ACIL supports ELAP's adoption of proven best practices for ensuring conformity to program requirements, detecting and correcting substandard practices at labs, and ensuring protections for end users of environmental test & measurement data.

These best practices are....

- Adopting the ISO 17025 based National Standard for Environmental Laboratories
- Recognizing ISO 17011 conforming third party Accreditation Bodies (ABs) to perform laboratory assessments
- Retaining Accreditation Authority (AA) responsibilities for program functionality

Standards for Labs and ABs

ACIL supports standards based conformity assessments of Labs and ABs, with laboratories choosing ELAP recognized ABs that best meet their assessment needs

Standards define procedures & practices ensuring program consistency

Standard conformity assessments ensure performance of Labs and ABs

TNI: ISO 17025 based National Standard for environmental testing labs

ABs assessed to conformity to the ISO 17011 standard for ABs by third parties, ILAC, NACLA, TNI.

Independent, professional AB assessment is an improvement over proven inconsistent, if not inadequate, US-EPA AB assessments

Standards based accreditation systems

- Facilitate implementation of new waterboard, legislative, or agency partner requirements for testing laboratories & regulatory programs
- Reduce time for labs/instrument manufacturers bringing new technologies for detecting & measuring emerging analytes of environmental and human health interest under a program of scientific rigor
- Reduce times to implement validated new technologies that lower testing costs and/or improve accuracy and precision of measurements

TNI: The National Lab Standard

- Consensus standard developed & revised through practical experience over more than 20 years
- ACIL opposes any modification to the standard while supporting “staged implementation” for small, public sector labs
- Modifications provide no evidentiary benefit or predictable advantage to labs or data user community
- Other states successfully implemented the standard for all sizes of environmental labs
- A temporary two tier system with an expiration date has value in the progressive implementation of quality improvement at smaller labs

ISO 17011 Conforming Third Party ABs

- “Good to Go/Plug & Play” supporting full program implementation
- AB consistency ensured by conformity assessments
- Reduce ELAP staffing costs while improving program sustainability
- Reduce redundant assessments for labs
- Enhance recognition & reciprocity supporting interstate commerce
- Improve implementation of new test methods & target analytes
- Accommodates unique requirements in CA
- Proven model: Clinical, Food, Drug, & Product testing accreditations
- Improves lab performance in environmental programs
- Where implemented, market forces have reduced assessment costs

Third Party Assessment is not "The Program"....
ELAP remains responsible for.....

- Enforcement
- PT Program
- AB Recognition/Performance Reviews
- Lab Assessment Reviews
- Program management
 - Systems & Communication

Work ahead of us.....

ACIL is ready to assist ELAP

- Define third party AB recognition
- Facilitate organizational development & information technology infrastructure
- Define phased implementation of the full TNI standard for smaller public sector laboratories